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Attorneys for Defendants and Counterclaimants
 ANALOG DEVICES, INC. and
 MAXIM INTEGRATED PRODUCTS, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

NUMBER 14 B.V.,

Plaintiff,

v.

ANALOG DEVICES, INC.; and MAXIM
 INTEGRATED PRODUCTS, INC.

Defendants.

ANALOG DEVICES, INC.; and MAXIM
 INTEGRATED PRODUCTS, INC.,

Counterclaimants,

v.

NUMBER 14 B.V., RUDY ESCHAUZIER,
 and NICO VAN RIJN,

Counter-Defendants.

Case No.: 5:24-cv-02435-EKL

**DECLARATION OF NICK DERE IN
 SUPPORT OF DEFENDANTS AND
 COUNTERCLAIMANTS' MOTION TO
 RETAIN CONFIDENTIALITY**

Date: May 14, 2025
 Time: 11:00 a.m.
 Dept: Courtroom 5, 4th Floor
 Judge: Hon. Nathanael Cousins

I, Nick Dere, declare as follows:

1. I am employed at Analog Devices Inc. ("ADI") as the Senior Director of Finance
 and hereby submit this Declaration in support of Defendants/Counterclaimants' Motion to Retain
 Confidentiality. I have personal knowledge of the facts set forth herein, and if called as a witness,

1 could and would testify competently hereto.

2 2. I have worked for over nine years in the field of finance. As a Senior Director of
3 Finance, I have personal knowledge of the purchase requisition process, including the necessary
4 approval steps, at ADI.

5 3. I am informed that one of ADI's purchase requisition documents was produced to
6 Plaintiff Number 14, B.V. in response to Number 14's Requests for Production, labelled as
7 document ADI_018933 to ADI_018934 (the "Purchase Requisition").

8 4. I am informed that the Purchase Requisition is a purchase requisition for the
9 FY2023 royalty payment to be paid to Number 14.

10 5. The Purchase Requisition contains extremely sensitive information about ADI's
11 internal approval process, including the identities of the relevant approvers and their
12 respective job titles.

13 6. The Purchase Requisition also contains extremely sensitive information related to
14 the royalty calculation and the associated royalty payments to Number 14.

15 7. Disclosure of the Purchase Requisition would significantly prejudice ADI, as it
16 reveals the royalty calculation and royalty payment values, which would give competitors and
17 other licensors insight into ADI's financial arrangements.

18 8. This could allow competitors to offer more attractive deals to other licensors,
19 while ADI's current licensors could use the information to demand higher royalty payments.
20 Revealing this information would unfairly tip the balance in business negotiations, putting ADI at
21 a significant disadvantage.

22 9. Disclosure of the Purchase Requisition would significantly prejudice ADI, as it
23 would provide competitors with insight into ADI's internal approval structure for the purchase
24 requisition, potentially making the company vulnerable to employee poaching.

25 10. Competitors could then target and recruit key employees from ADI, potentially
26 bypassing the same level of effort and resources that ADI invests in hiring top talent. Specifically,
27 these employees possess highly confidential financial information about ADI.

28 11. If the Purchase Requisition was made public, it would significantly prejudice ADI

1 by also increasing the risk of data breaches. It would expose the individuals with knowledge
2 about the company's financials and reveal which employees have access to confidential
3 information, making ADI more susceptible to security threats.

4 12. The Purchase Requisition is kept confidential within the company and is not
5 accessible to the public.

6 13. Maintaining the confidentiality of the Purchase Requisition to the fullest extent
7 possible is necessary to protect ADI's business interests, security interests, and competitive
8 standing in the marketplace.

9 I declare under penalty of perjury under the laws of the United States of America that the
10 foregoing is true and correct.

11 Executed this 24 day of March, 2025 at San Jose (city), California (state).

12 
13 _____
14 NICK DERE